

UNITED STATES OF AMERICA  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
v. )  
 )  
JILL DOUCETTE )  
 )

CRIMINAL NO.  
04-mj-10135-GAO  
MJM04-812-MBB

12-7-04 10:42  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MOTION TO JOIN IN MOTION OF THOMAS SCHOLA FOR DISCOVERY  
AND FOR ADDITIONAL DISCOVERY

The defendant, Jill Doucette, hereby moves this Honorable Court to grant her leave to join in the motion of Thomas Schola for discovery concerning the quantity of drugs attributable to the defendant. The defendant states the following grounds in support of this motion:

1. Ms. Doucette is a co-defendant of Mr. Schola. The government's theory is that she drove him to various locations where he participated in drug transactions.
2. The same issues raised by Mr. Schola pursuant to Apprendi and Blakely also apply with equal force to the case against Ms. Doucette.
3. In addition to the total drug quantity, Ms. Doucette seeks a statement by the government as to the quantity of controlled substances with which it claims she had direct involvement, and the basis for that position.

WHEREFORE, the defendant respectfully requests this Honorable Court to order the government to provide defense counsel with the discovery sought in the motion

concerning drug quantity filed by Thomas Schola, and further to order the government to provide defense counsel with the information sought in paragraph three of this motion.

Respectfully submitted,

JILL DOUCETTE

By her Attorney



Leslie Feldman-Rumpler, Esq.

BBO # 555792

101 Tremont Street, Suite 708

Boston, MA 02109

(617) 728-9944

CERTIFICATE OF SERVICE

The undersigned, counsel for the defendant, hereby certifies that the within document has been served on all parties of interest.

12/6/04  
Date

  
Leslie Feldman-Rumpler, Esq.